

No.: 03-19-00198-CV

FILED IN
3rd COURT OF APPEALS
AUSTIN, TEXAS
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JEFFREY D. KYLE
Clerk

**IN THE COURT OF APPEALS
THIRD COURT OF APPEALS DISTRICT
AUSTIN, TEXAS**

**MADELEINE CONNOR
Appellant/Plaintiff**

**V.
DOUGLAS HOOKS AND ELIZABETH HOOKS
Appellees/Defendants**

**APPEAL FROM THE 201ST DISTRICT COURT
OF TRAVIS COUNTY, TEXAS
TRIAL COURT CAUSE NO. D-1-GN-18-005130**

**APPELLEES/DEFENDANTS MOTION TO STAY
APPELLANT/PLAINTIFF MADELEINE CONNOR'S
APPEAL, REQUIRE COMPLIANCE WITH CHAPTER 11, TEX. CIV.
PRAC. & REM. CODE AND/OR DISMISS THE APPEAL**

The Rasmus Firm
P. O. Box 1484
Manchaca, TX 78652-1484
512.481.0650
512.481-0604 (facsimile)
Sheryl Gray Rasmus
State Bar No. 16554001
sgrasmus@rasmusfirm.com
Attorneys for Appellee Douglas Hooks

NUNIS & ASSOCIATES
801 West Avenue, Suite 200
Austin, TX 78701
512/236-9694
512/236-9695 (facsimile)
Robert P. Nunis
TSB# 15134650
bnunis@nunislaw.com
Stephanie A. Criscione
TSB# 24109768
scriscione@nunislaw.com
Attorneys for Appellee Elizabeth Hooks

TO THE HONORABLE THIRD COURT OF APPEALS:

NOW COME APPELLEES DOUGLAS HOOKS AND ELIZABETH HOOKS and move this Court to stay this appeal until the Appellant, Madeleine Connor obtains permission from the local administrative judge to file this appeal pursuant to Chapter 11, Tex. Civ. Prac. & Rem. Code.

This appeal arises out of an Order by the Honorable Catherine Mauzy, 201 Judicial District Court, Travis County, Texas, dated March 8, 2019, determining Madeleine Connor to be a vexatious litigant. [CR. 266-268] Ms. Connor filed her notice of appeal on March 27, 2019. [CR. 276-277] On July 26, 2019, Ms. Connor filed the Docketing Statement and allegedly a Notice of Challenge to Constitutionality of a State Statute, specifically Chapter 11, Texas Civil Practice and Remedies Code.

As Ms. Connor has been designated a vexatious litigant she must comply with the procedures set forth in Chapter 11, §11.102(a) of the Texas Civil Practice & Remedies Code and obtain permission from the local administrative judge to file new litigation-this appeal. Ms. Connor has not done so.

Appellees move this Court to stay this appeal until such time as Appellant has obtained permission from the local administrative judge, the Honorable Lora

Livingston, 261st Judicial District Court, Travis County Courthouse, P. O. Box 1748, Austin, Texas 78767.

Pursuant to Chapter 11, §11.055 Texas Civil Practice & Remedies Code, Appellees further urge this Court to require that Appellant furnish security by posting a surety bond.

In the event that Appellant fails to obtain permission to file this appeal and/or fails to furnish security, Appellees move this Court to dismiss this appeal.

Respectfully submitted,

THE RASMUS FIRM
P. O. Box 1484
Manchaca, TX 78652-1484
512/481-0650
512/481-0604 (facsimile)
sgrasmus@rasmusfim.com



Sheryl Gray Rasmus
TSB# 16554001
ATTORNEY FOR APPELLEE
DOUGLAS HOOKS

NUNIS & ASSOCIATES
801 West Avenue, Suite 200
Austin, TX 78701
512/236-9694
512/236-9695 (facsimile)



Robert P. Nunis
TSB# 15134650
bnunis@nunislaw.com
Stephanie A. Criscione
TSB# 24109768
scriscione@nunislaw.com
ATTORNEYS FOR APPELLEE
ELIZABETH HOOKS

CERTIFICATE OF CONFERENCE

I certify that I conferred with Appellant regarding this motion and she has stated that she is opposed to this motion.



Sherry Rasmus

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was provided to counsel and Appellant named below by email, ProDoc service and/or facsimile in accordance with the Texas Rules of Civil Procedure on the 21st day of August, in accordance with the Texas Rules of Civil Procedure.

Madeleine Connor
P. O. Box 161962
Austin, TX 78716-1962
512/289-2424
512/329-5229 (facsimile)
mgbconnor@yahoo.com



Sherry Rasmus